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January 24, 2020

VIA ECF

The Honorable William H. Pauley III
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Bryan Cohen, 19 Cr. 741 (WHP)

Dear Judge Pauley:

We write on behalf of the defendant, Bryan Cohen, and on consent of the Government and Pre-trial Services, in the above-referenced case, to request a slight modification to his conditions of release. Specifically, Mr. Cohen seeks to be able to go anywhere within his apartment building (*i.e.* the multi-purpose room for larger gatherings of family/friends and the fitness center). Notably, we are not re-arguing for removal of home detention as a condition of release. Rather, our application is merely to expand the definition of "home" to include his entire apartment building rather than just his apartment.

The Court, from our previous application, is undoubtedly aware of the facts and circumstances concerning Mr. Cohen's current conditions of release. Mr. Cohen is in strict compliance with all of those conditions. Additionally, on January 7, 2020, Mr. Cohen accepted responsibility for his conduct and pled guilty before Magistrate Judge Freeman to Count One of the Superseding Indictment. Thus, we ask for this slight modification while Mr. Cohen awaits sentencing on April 3, 2020. Thank you for your consideration.

Respectfully submitted,


Benjamin Brafman

cc: All Counsel (via ECF)
Pre-Trial Services Officer Ashley Cosme (via email)